

DLA Piper LLP (US)

1251 Avenue of the Americas, 27th Floor New York, New York 10020-1104 www.dlapiper.com

Thomas R. Califano thomas.califano@dlapiper.com T 212.335.4990 F 212.884.8690

June 21, 2018

VIA CM/ECF

The Honorable Alan S. Trust United States Bankruptcy Court Eastern District of New York Alfonse M. D'Amato Federal Courthouse 290 Federal Plaza, Courtroom 760 Central Islip, New York 11722

> Re: In re Orion HealthCorp, Inc., et al., Case No. 8-18-71748-ast; Proposed Orders on Independent Reviewer and Motion to Quash

Dear Judge Trust:

Pursuant to the Court's request via e-mail communication on June 19, 2018, enclosed herewith for the Court's consideration are proposed orders related to (i) the appointment of an independent reviewer under Rule 706 of the Federal Rules of Evidence (Exhibit A); and (ii) the Motion Pursuant to FRCP 45(D)(3) to Quash and/or Modify Debtors' Subpoena Seeking Non-Debtor Records held by Robinson Brog Leinwand Greene Genovese & Gluck P.C. [D.E. 228] (Exhibit B) (together, the "Proposed Orders").

The Proposed Orders incorporate comments we received from counsel to Robinson Brog Leinwand Greene Genovese & Gluck P.C. as well as counsel to Paul Parmar and certain of his related entities. The Office of the United States Trustee takes no position with respect to the Proposed Orders.

The Debtors respectfully request that the Court grant the Proposed Orders.

Respectfully submitted,

DLA Piper LLP (US)

/s/ Thomas R. Califano Thomas R. Califano